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January 19, 2016

**VIA ELECTRONIC MAIL**

Lisa A. Marcy  
CLYDE SNOW & SESSIONS  
One Utah Center, Thirteenth Floor  
201 South Main Street  
Salt Lake City, UT 84111  
*lmarcy@clydesnow.com*

**Re: *Chatwin v. Draper City, et al.***  
***Civil No. 2:14-cv-00375-DAK***

Dear Lisa:

I am in receipt of your objection to the subpoena to Kathy Torrence, which we notified you of earlier this month.

Your objections are improper for two reasons. First, you do not represent Ms. Torrence and your client is not the person being subpoenaed. If Ms. Torrence is not available on the designated date, she can contact me or file a formal objection on those grounds. Second, the subpoena does not violate the fact discovery deadline because we are conducting the inspection for purposes of expert discovery. One or more of our experts will be present during the inspection to take measurements, photographs, and gather other information that they will use in their reports.

Therefore, we are serving Ms. Torrence with the subpoena as planned. Please feel free to contact me should you wish to discuss this matter further.

Lisa A. Marcy  
January 19, 2016  
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Sincerely,

**DURHAM JONES & PINEGAR, P.C.**

A handwritten signature in black ink, reading "Blake Hamilton". The signature is written in a cursive, flowing style.

R. Blake Hamilton

cc: John K. Johnson  
Clients